S/N 10/727,240 Amendment with RCE

REMARKS

A review of the claims indicates that:

- A) Claims 1—34 are cancelled.
- B) Claims 35—54 are new.

In view of the following remarks, Applicant respectfully requests allowance of the new claims.

New Claims

Claims 35—54 are new. These claims recite aspects that are not taught or suggested by the prior art of record. The Applicant respectfully requests allowance.

Referring to the Gebert reference, the most relevant aspect is at [0008], wherein Gebert discusses XML-FO to PDF translation. (Note that Wikipedia says that FOP is related to XSL-FO to PDF translation, not XML-FO. Gebert appears to have made a typo.) However, Gebert does not teach or suggest the PPML to PDF translation recited by the Applicant's claims. Moreover, there is no suggestion in Gebert's text or drawings of why Gebert's translation from XSL-FO should alternatively be performed on PPML. While PPML and XSL-FO are both XML related, the motivation taught by Gebert is that XSL-FO files translated by FOP into PDF are then viewable and/or printable (see [0008] at line 2). Since PPML files are already printable, there would be no motivation to create a translation analogous to FOP for PPML.

Previously, the Patent Office has suggested that PODI teaches and/or suggests conversion of PPML to PDF. The Applicant respectfully disagrees. Instead, PODI teaches that a PPML document can be reconfigured so that its assets are in PDF format. For example, a PPML document having JPEG and other

Lee & HAVES, PLIC 9

S/N 10/727,240 Amendment with RCE

assets would become a PPML document having PDF assets. However, the document would still remain a PPML document. This is what is meant by the notation, seen in PODI, of "PPML/PDF". That is, a PPML document may have assets of many types (e.g. TIFF or JPEG). However, the document can be "normalized" to have all PDF assets, and is therefore labeled PPML/PDF. Thus, PODI does not teach or suggest PPML to PDF translation.

Reference to specific locations in PODI support this position. The PODI document teaches a product called "Argon PPML/PDF" (see logo in the upper left corner, all slides). Accordingly, PODI teaches the creation of a PPML/PDF document. Such a document is a PPML document wherein all of the assets have been converted to PDF (see slides 25—27 particularly). Thus, assets, such as images in other formats, are all translated to PDF, for inclusion within the PPML/PDF document. Referring to PODI at "1" in slide 26, we see that PPML having exclusive use of PDF is such that "data representation in PPML is limited to integral PDF files." Thus, what PODI teaches is a PPML document having PDF assets within its tree structure. Accordingly, PODI does not teach or suggest translating from PPML to PDF. PODI teaches translating a PPML document having many different asset types into a PPML document having PDF assets. Accordingly, PODI is deficient to support the Section 103 rejection. The Applicant respectfully requests that Claim 1 be allowed to issue.

Additionally, neither reference teaches or suggests marking a first PDF document for creation of the PPML template, populating the template with data and converting the template to a second PDF document for printing. Such a method allows the user to create a PPML in an efficient manner not known in the

LEE & HAYES, FLAC

23

24

prior art. Additionally, the method recites conversion of the PPML document to PDF form, which is not disclosed, taught or suggested by the prior art of record. Gebert does not teach such a conversion. By printing the PDF document, the user is able to confirm (by looking at the printed PDF) the state of the PPML document (e.g. an error-free state) before doing a major print job on high-end printers.

Therefore, the Applicant respectfully submits that the claims recite elements not taught or suggested by the prior art of record. Accordingly, the Applicant respectfully submits that the claims are in condition for allowance and asks that such an allowance be provided.

Conclusion

The Applicant submits that the claims as presented are in condition for allowance. Accordingly, the Applicant respectfully requests that a Notice of Allowability be issued. If the Patent Office's next anticipated action is not the issuance of a Notice of Allowability, the Applicant respectfully requests that the undersigned attorney be contacted to schedule an interview.

Respectfully Submitted,

Dated: 8-2-07

By:

David S. Thompson Reg. No. 37,954 Attorney for Applicant

LEE & HAYES PLLC Suite 500

421 W. Riverside Avenue Spokane. Washington 99201

Telephone: 509-324-9256 x235 Facsimile: (509) 323-8979